

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JOHN MOORE,

Plaintiff,

v.

SOTERIA PROTECTION, LLC,

Defendant.

Civil Action No.:

1:21-cv-04946-WMR

JURY TRIAL DEMANDED

RULE 68 OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant Soteria Protection, LLC makes this Offer of Judgment. In the event that Plaintiff accepts this offer, Defendant shall be notified in writing within 14 days of the receipt of this offer.

Plaintiff shall be on notice that in the event this offer is not accepted and Plaintiff receives a judgment which is equal to or less than the amount offered, he will be responsible for the costs and attorney's fees incurred subsequent to the receipt of this offer. He is further notified that recovery for his attorney's fees will be cut off from the date of this offer in that event.

This Offer of Judgment includes a one-time payment of \$3,500.00, plus the

reimbursement of statutory costs and reasonable documented attorney's fees incurred through and including April 7, 2022, as allowed under applicable law.

Defendant states that this Offer of Judgment does not admit any wrongdoing on the part of the Defendant, and Defendant does not consent to its use in any further or other proceedings.

1. Pursuant to the terms of Rule 68, Defendant offers to allow JOHN MOORE to take judgment against them in the amount of \$3,500.00, plus his costs of litigation accrued to date as permitted by Fed.R.Civ.P. 54(d)(1).
2. Defendant makes this offer more than fourteen days before this case is set for trial. Fed.R.Civ.P. 68.
3. This offer is unconditional.
4. This offer is made for the purposes of Rule 68 only and is not and may not be construed to be an admission that Defendant is liable to John Moore or that John Moore is entitled to any relief whatsoever.
5. Pursuant to Fed.R.Civ.P. 68, this offer of judgment shall expire if rejected in writing by John Moore and/or if it is unaccepted within 14 days of the date indicated below.

This 11th day of May, 2022.

/s/ William Gregory Dobson, Esq.

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CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the within and foregoing
RULE 68 OFFER OF JUDGMENT by using the Court's CM/ECF electronic
filing system:

V. Severin Roberts, Esq.
Amy C. Sillmon, Esq.
amy@justiceatwork.com
severin@justiceatwork.com

This 11th day of May, 2022.

/s/ William Gregory Dobson
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